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Attorneys for the State of Alaska

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

STATE OF ALASKA,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
THE INTERIOR, DEB HAALAND, in her
official capacity as Secretary of the
Department of the Interior, INTERIOR
BOARD OF LAND APPEALS, STEVEN J.
LECHNER, in his official capacity as
Acting Chief Administrative Judge of the
Interior Board of Land Appeals, BUREAU
OF LAND MANAGEMENT, TRACY
STONE-MANNING, in her official capacity
as Director of the Bureau of Land
Management, BUREAU OF LAND
MANAGEMENT ALASKA STATE
OFFICE, and THOMAS HEINLEIN, in his
official capacity as Acting State Director of
the Bureau of Land Management Alaska
State Office,

Defendants.

Case No. 3:22-cv-00078-SLG

**PLAINTIFF'S UNOPPOSED
MOTION FOR ENLARGEMENT
OF WORD LIMIT**

Plaintiff State of Alaska (“State”) respectfully requests that the Court enlarge the word limit for Plaintiff’s Motion for Summary Judgment opening brief and Defendants’ response brief from 10,000 words to 13,000 words. The State also requests that the Court enlarge the word limit for Plaintiff’s reply brief from 5,700 words to 7,500 words. As grounds for this Motion, the State of Alaska states as follows:

1. Counsel for the State conferred with counsel for the U.S. Department of the Interior, Secretary of the Interior Deb Haaland, the Interior Board of Land Appeals, Acting Chief Administrative Judge of the Interior Board of Land Appeals Steven J. Lechner, the Bureau of Land Management, Director of the Bureau of Land Management Tracy Stone-Manning, the Bureau of Land Management Alaska State Office, and Acting State Director of the Bureau of Land Management Alaska State Office Thomas Heinlen (“Federal Defendants”). The Federal Defendants do not oppose the relief requested.

2. The State’s summary judgment briefing challenges the Interior Board of Land Appeals (“IBLA”)’s decision regarding two consolidated appeals brought by the State regarding actions by the Bureau of Land Management’s Alaska State Office pertaining to the northwestern boundary of the Alaska National Wildlife Refuge, as laid out in Public Land Order 2214. *See* Order Re Motion to Supplement Administrative Record, at Dkt. 23 (remanding matter to the IBLA); *State of Alaska (On Judicial Remand)*, 198 IBLA 218 (2024).

3. The IBLA’s decision is approximately 10,000 words. The Board’s decision in turn relies on its previous opinion in this matter, *State of Alaska*, 196 IBLA 155 (2020), which is approximately 24,000 words. In total, the State is challenging the IBLA’s two decisions, which, together, are over approximately 34,000 words.

4. Pursuant to Local Civil Rules 7.4(a) and 16.3(c)(6), the presumptive word limit for the State's opening brief and the Federal Defendants' response brief is 10,000 words, respectively, and the State's presumptive word limit for its reply brief is 5,700 words.

5. The State is responsible for adequately and fully explaining to the Court why the IBLA's decisions in this matter are erroneous. In order to provide the Court the full context regarding the Board's errors in this matter, an enlarged word count of 13,000 words for its opening brief and 7,500 words for its reply brief is necessary. The State believes that the 13,000 and 7,500 respective word counts are no longer than necessary to provide the Court with the necessary information and supporting caselaw.

6. A proposed order is submitted herewith.

DATED: September 12, 2024.

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